



Marlene H. Dortch, Secretary
Federal Communications Commission
445-12th Street, SW
Washington, D.C. 20554

Re: MM Docket No. 13-50
Coalition for Broadcast Investment
Request for Clarification of the Commission's Policies
and Procedures Under 47 U.S.C. § 310(b)(4)

Dear Ms. Dortch:

On behalf of Adelante Media Group, LLC (“Adelante”), one of America’s fastest growing radio and television companies, specializing in emerging Hispanic markets, I am writing to express our support for the clarification in policy sought by the Coalition of Broadcast Investment (“Coalition”) in its letter filed August 31, 2012.

I’ve spent my entire career in broadcasting, working as an on air personality, program director, station manager and senior executive and owner. My experience includes almost a decade as Senior Vice President of Jacor Communications and its successor, Clear Channel Communications, as well as management positions at Sherman Broadcasting Corporation, Greater Media, Lin Broadcasting, Lincoln Group, Atlantic Ventures and Command Communications. During my career, I’ve had involvement with and oversight of over 800 different radio stations in nearly 160 markets.

I founded Adelante with a group of investors in 2010. Our company specializes in Spanish language radio and television broadcasting in emerging Hispanic markets in the Western United States. Adelante owns and operates 18 radio stations in 9 markets. We also syndicate a Regional Mexican format, “LaGranD,” nationwide and produce a Spanish language CHR format known as “Latino” across many of our markets. Adelante owns and operates 3 television stations in 3 markets. Our stations in Milwaukee and Salt Lake City have affiliated with MundoFox, the national Spanish language television network launched last year, and our station in Sacramento is affiliated with Azteca America, another national Spanish language television network.

I am also personally familiar with station financing issues. In addition to my experience in station management and ownership, I am President and CEO of Broadcast Management and Technology, a firm that specializes in working with financial institutions and broadcast industry owners. The company through the years has advised in many broadcast situations where the inability to attract capital has caused great hardship

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which could have been averted with having the same access to foreign investment as competing industries, and just about any other industry.

Adelante is a member of the Coalition because access to capital is one of the most important issues facing broadcasters today. Unfortunately, the FCC's current practice with respect to the foreign ownership benchmark puts over-the-air broadcasters like our company at a serious disadvantage in competing against distribution platforms that aren't subject to the same policy. Our radio stations compete against Internet and services which aren't even subject to the foreign ownership benchmark. Our television stations compete against pay TV networks; cable, satellite and Telco multichannel video programming distributors; Internet over-the-top providers like Netflix, Hulu and Apple; and online services like Google, Twitter, Facebook and Yahoo. None of them are not subject to *any* restrictions on foreign investment.

Broadcasters need access to additional capital to support the service they provide and finance new offerings using digital technology. Access to additional capital will benefit America's fastest growing population segment by supporting the creation of additional programming aimed at U.S. Hispanics and bilinguals. And access to additional capital will help foster new entrants into broadcast ownership.

The Coalition's requested clarification does not ask for much -- only that the Commission *consider* a proposed equity investment above the 25% benchmark in a particular broadcaster, based on the facts and circumstances of that particular investment. In this day and age, it makes no sense not to consider such investments. At other times in our history, the restriction was understandable. But in today's world of interconnectivity, where someone can become an overnight sensation virally, it is somewhat archaic to believe that the restriction has any validity other than to handicap broadcasters' access to financial sources that are available to other industries under the Commission's regulatory authority.

Sincerely,

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